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9 Attorneys for Federal Defendants

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11
12 UNITED STATES DISTRICT COURT
13 SOUTHERN DISTRICT OF CALIFORNIA

14 KAJI DOUSA,

15 Plaintiff,

16 v.

17 U.S. DEPARTMENT OF HOMELAND
SECURITY ("DHS"); U.S.
18 IMMIGRATION AND CUSTOMS
ENFORCEMENT ("ICE"); U.S.
19 CUSTOMS AND BORDER
PROTECTION ("CBP"); KEVIN K.
20 MCALEENAN, Acting Secretary of DHS;
MATTHEW T. ALBENCE, Acting
21 Director of ICE; MARK A. MORGAN,
Acting Commissioner of CBP; and PETER
22 FLORES, Director of Field Operations for
CBP, San Diego,

23 Defendants.
24

Case No.: 19-cv-1255-LAB (KSC)

**DECLARATION OF ERNEST
CORDERO, JR.**

25 I, Ernest Cordero Jr., declare:

26 1. I am an Assistant United States Attorney and a member of the United States
27 Attorney's Office for the Southern District of California. I am lead trial counsel for the
28

1 Federal Defendants in this action and have personal knowledge of the statements contained
2 in this declaration. If called upon to do so, I could and would competently testify thereto.

3 2. Attached to my declaration as Exhibit 1 is a printout of a downloaded set of
4 pages I obtained from Plaintiff's Twitter feed @KajiDousa posted and available for public
5 viewing on August 14, 2019.

6
7 I declare under penalty of perjury that the foregoing is true and correct. Executed on
8 September 9, 2019 in San Diego, California.

9
10 s/ Ernest Cordero
11 ERNEST CORDERO, JR.
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EXHIBIT 1

Pastor Kaji Douša

@KajiDousa

Jesus-follower. Senior Pastor,
[@ThePark1010](#) . Co-Chair,
[@NewSanctuaryNYC](#) . she/her/ella

[parkavenuechristian.com](#)

Joined June 2015

14 Photos and videos


Tweets **Tweets & replies** **Media**

Pinned Tweet

**Pastor Kaji Douša** @KajiDousa · Jul 8

Because I have a voice and won't be intimidated - even by the most powerful government in the world - I am suing [#DHS](#) [#ICE](#) [#CBP](#) .

So grateful to [@aflores](#) & [@BuzzFeedNews](#) for sharing my story.

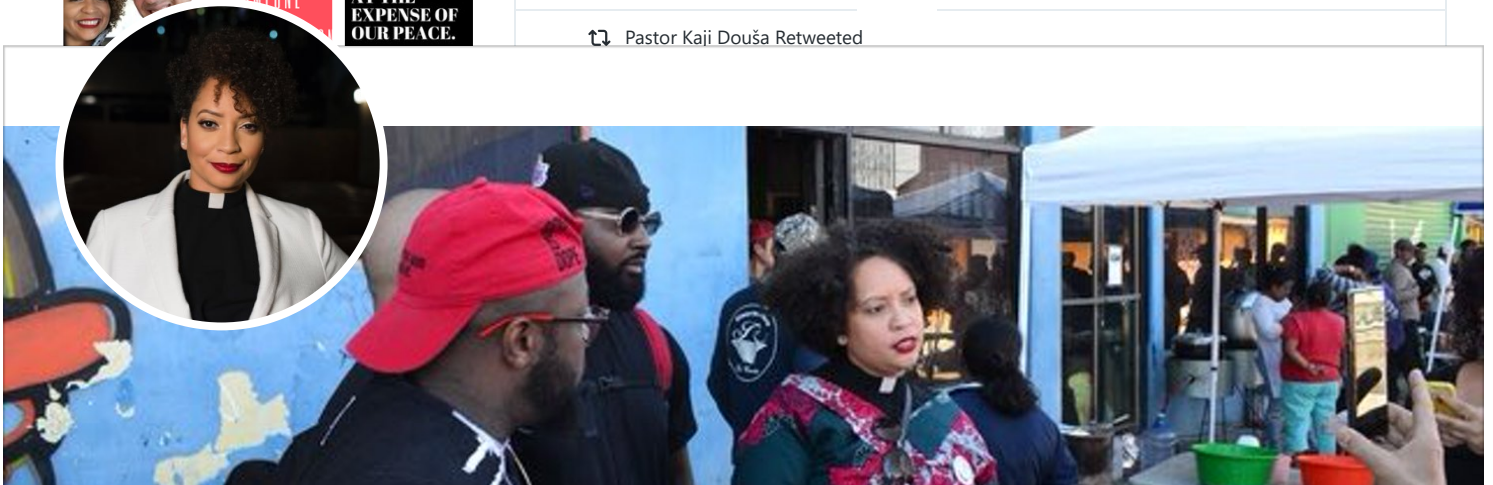
We MUST be [#FreeToPray](#) for every and anyone who needs us.

The Park @ThePark1010

"Under this system of surveillance nobody is safe, nobody gets to question, nobody gets to dissent," @KajiDousa told @BuzzFeedNews. "I'm the nobody for now because I'm a black woman & we're always the testing group, but I'm going to come out stronger because I have a great case." ...

14 112 260

Pastor Kaji Douša Retweeted

**Pastor Kaji Douša**

@KajiDousa

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889
Following
477
Followers
1,428
Likes
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209 284 7.4K

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Pastor Kaji Douša Retweeted

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call officials, go to protests, get arrested if you're able, visit people in detention, accompany immigrants to court.

[@JFREJNYC](#) [@MaketheRoadNY](#) [@CosechaMovement](#) [@NewSanctuaryNYC](#)
[@BAJltweet](#)

4 43 83

[Show this thread](#)



Pastor Kaji Douša [@KajiDousa](#) · 5h

Doxing is horrific, y'all. I'm so sorry [@ljeomaOluo](#) is having to deal with this.

ljeoma Oluo [@ljeomaOluo](#)

Someone apparently called and said there were two dead bodies in my house. These monsters.

[Show this thread](#)

1



Pastor Kaji Douša [@KajiDousa](#) · 5h

Is it just me, or is anyone else wondering if the CO & overtime guard who "fell asleep" at [#MCC](#) are black? Because I have expectations of what will happen if they are.

[#Epstein](#)

1 1

[Retweeted](#) Pastor Kaji Douša Retweeted



deray [@deray](#) · 6h

I am being sued by an officer in Baton Rouge who was allegedly hit with a rock in 2016 during the protests. This case was dismissed. Then the 5th Circuit overruled that & said I can be held liable. It makes no sense.

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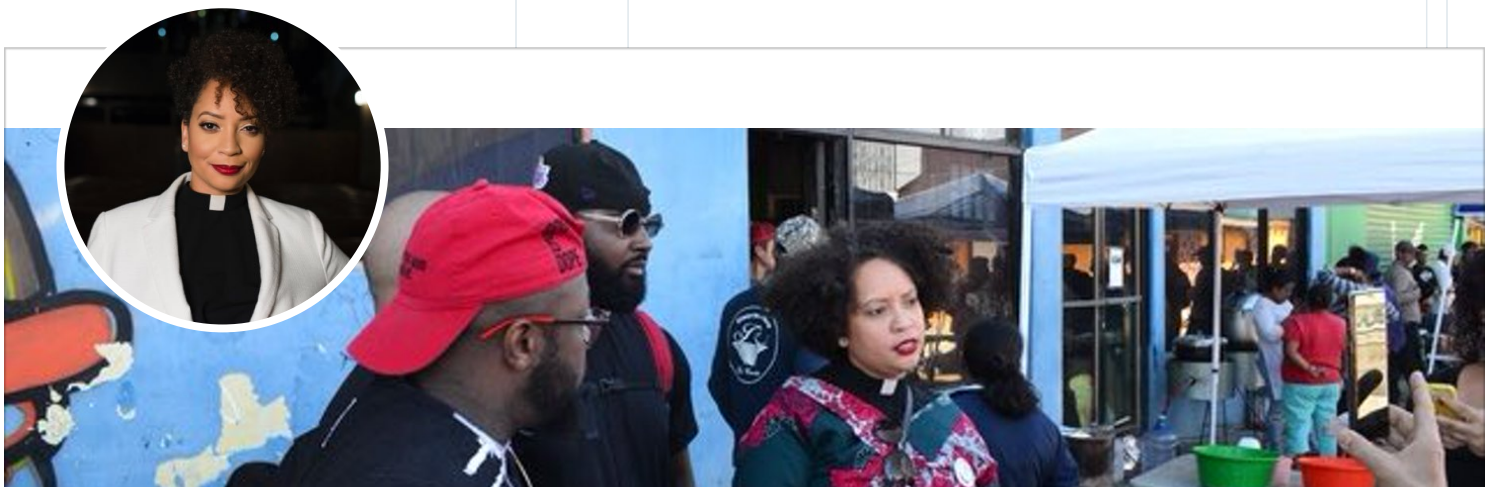
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[@KajiDousa](#)

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In 2021, GOP-controlled states will try to use this citizenship data from the Census Bureau to draw new congressional and state leg districts. Their goal, in the words of the GOP's longtime redistricting guru Dr. Hofeller, is to advantage "Republicans and Non-Hispanic Whites."

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ent counts?
 ion and we do not comment on ongoing litigation, but the C
 020 Census and enumerate all persons living in the United
 including citizenship data in the redistricting file?
 outreach to design its data products, including multiple rec
 tps, and outreach to data users and stakeholders.

response confirms, that it will be producing block level
 data on citizenship voting age population

Show this thread



1

3

Pastor Kaji Douša Retweeted

**Robbie Gramer** @RobbieGramer · 22h

The grubby legacy of British imperialism remains in Asia, where two seemingly
 distinct crises—in Hong Kong and Kashmir—share the same legacy

The World Is Reaping the Chaos the British Empire Sowed

Locals are still paying for the mess the British left behind in Hong Kong and
 Kashmir.

foreignpolicy.com

20

86

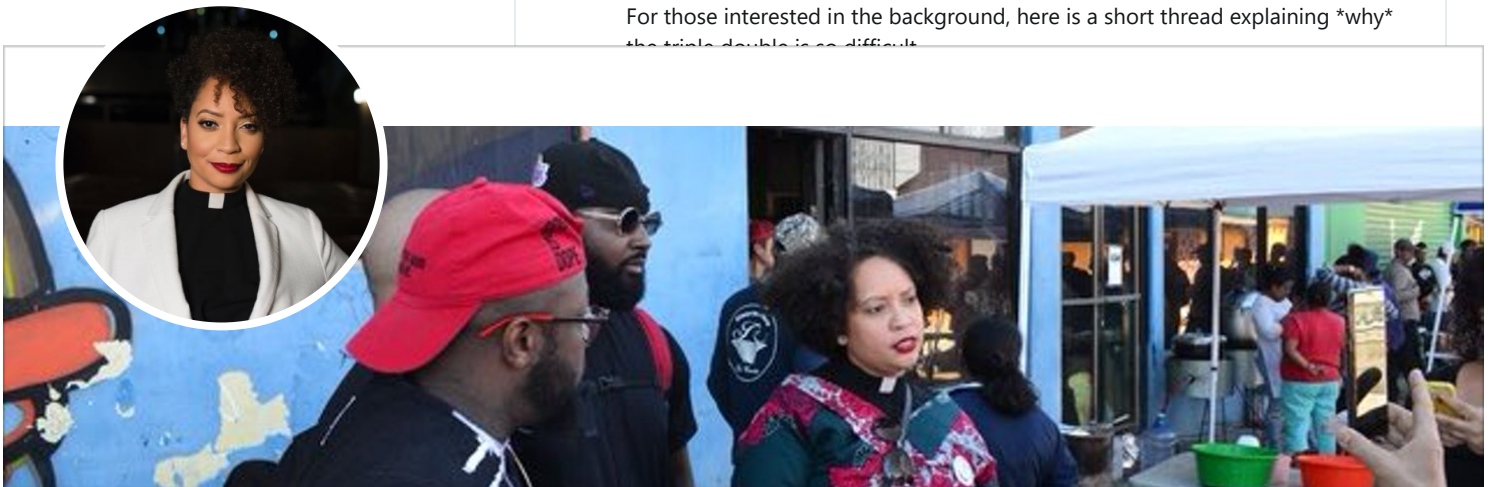
161

Pastor Kaji Douša Retweeted

**Suzanne F. Boswell** @sf_boswell · Aug 12

Last night, Simone Biles successfully performed a triple double, and the entire
 world is (correctly) freaking out.

For those interested in the background, here is a short thread explaining *why*
 the triple double is so difficult



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 @KajiDouša

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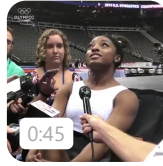
Pastor Kaji Douša Retweeted

**Suzanne F. Boswell** @sf_boswell · Aug 12

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Have an account? **Log in****Olympic Channel** @olympicchannel

Emotional @Simone_Biles expresses frustration toward USA gymnastics at the 2019 U.S. Championships.

Show this thread

160

684

7.2K

[Show this thread](#)

Pastor Kaji Douša Retweeted

**Morgan Jerkins** @MorganJerkins · Aug 13

If you're an Indigenous WOC who wants to do more reporting on issues in tribal nations, contact me: mjerkins@medium.com.

I love @RuthH_Hopkins's work and I know there's more stories out there.

4

38

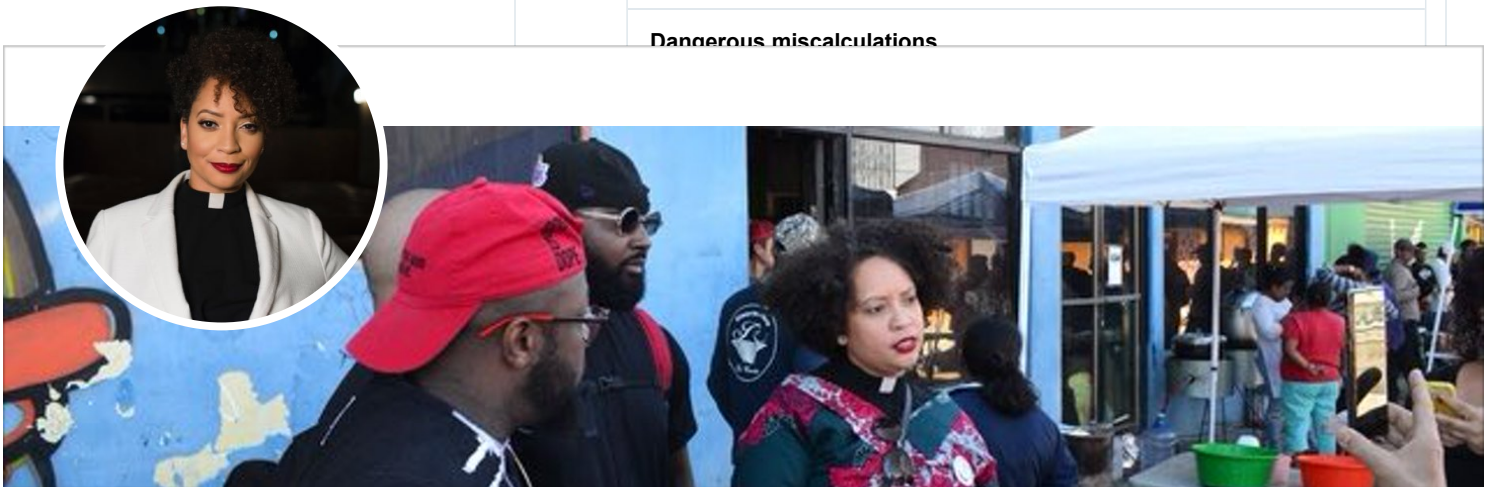
42

Pastor Kaji Douša Retweeted

**The Economist** @TheEconomist · Aug 11

America cannot have a cheap currency, a trade conflict and a thriving economy all at once

Dangerous miscalculations

**Pastor Kaji Douša**

@KajiDouša

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Pastor Kaji Douša Retweeted

**Stephanie Kendell** @skendell · Aug 10

Join me tomorrow at 11am at @ThePark1010 and see what Kris Kross's Jump, Toni Morrison. Psalm 28. and 400 people showing up to a birthday party have to do

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Have an account? **Log in****Pastor Kaji Douša** @KajiDousa · Aug 10

The *only* person I trust right now in this is NY AG @TishJames .

2

15

80

[Show this thread](#)**Pastor Kaji Douša** @KajiDousa · Aug 10

So. I don't know the law. But I do know MCC is in NYC. @JumaaneWilliams & others: what's the chain of custody? Who watches over the evidence?

Bc we cannot allow any more inconvenient/convenient mess ups in this #epsteinDead case.

Seth Abramson @SethAbramson

BREAKING: twitter.com/PaulaReidCBS/s...

1

5

21

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Pastor Kaji Douša Retweeted

**Preet Bharara** @PreetBharara · Aug 10

There should be — and almost certainly is — video of Epstein's suicide at MCC. One hopes it is complete, conclusive, and secured.

3.1K

14K

56K

**Pastor Kaji Douša** @KajiDousa · Aug 10

THIS

jelani cobb @jelani9

He slit his wrists with Occam's Razor. twitter.com/CrookedKnight/...

Pastor Kaji Douša Retweeted

**Marc Lamont Hill** @marclamonthill · Aug 10**Pastor Kaji Douša**

@KajiDousa

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"Cutting through the hedges, caveats and non-denial denials..."

I am a sucker for a good turn of phrase. Especially in pursuit of justice in the land. The lying liars who keep lying to wrest control from the people must be stopped.

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Using images to help you understand the world around you, Twitter's visual search tool can help you find photos and videos related to your tweets. This tool is powered by a machine learning algorithm that can identify objects, people, and places in images. It can also help you find images that are similar to the ones you're looking at. This tool is powered by a machine learning algorithm that can identify objects, people, and places in images. It can also help you find images that are similar to the ones you're looking at.

Daniel Jacobson @Dan_F_Jacobson

We have some things to say about the government's response to our request for sanctions in the Census case. From the reply we just filed:



Pastor Kaji Douša Retweeted

**Sherrilyn Ifill** @Sifill_LDF · Aug 9

Under oath before Congress last month, FBI Director Wray testified two weeks ago that white supremacists were the biggest domestic terror threat - not this fabricated "black identity extremists" myth. We want answers from Wray on this.

FBI ranks "black identity extremists" bigger threat than Al Qaeda, wh...

White supremacist groups are mentioned in the files, however they are described as a "medium threat."

newsweek.com



122



1.8K

4.1K

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Pastor Kaji Douša Retweeted

**Pastor Kaji Douša**

@KajiDouša

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Members of the Uighur diaspora in Southern California say every one of them has a friend or family member who has been "disappeared" by

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11 295 390

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Pastor Kaji Douša Retweeted

Make the Road NY

@MaketheRoadNY · Aug 9

#BREAKING: PNC Bank will pull out of financing private prison & immigrant detention companies.

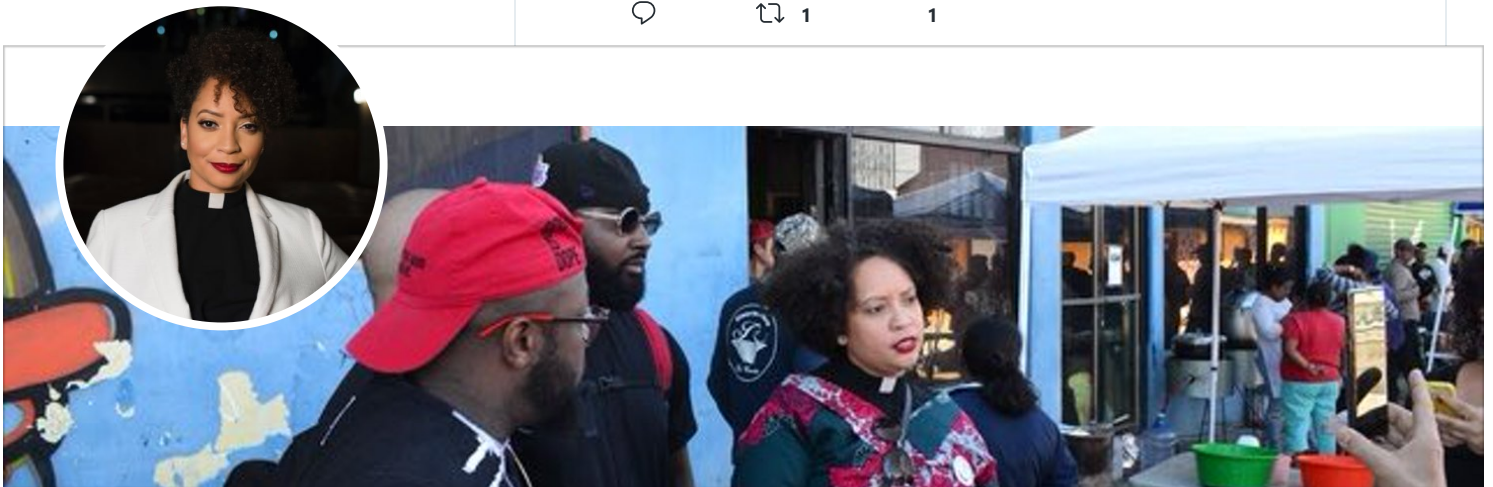
This comes after years of organizing with our [#BackersofHate](#) and [#FamiliesBelongTogether](#) allies, who've successfully got 9 banks to pledge to pull out.

60 1.6K 4.5K

**Pastor Kaji Douša** @KajiDousa · Aug 9

God prosper our strength. Shield our faces. Help us survive. Build our thriving. Bless our enemies, wherever they may be. May they never reach closer than we can bear. Amen. 6/6 🙏

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The most effective prayers for abusers are offered from the strength garnered with distance. Pray with your cheek far from the strike and find your strength. 🙏
3/6

1 1

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Pastor Kaji Douša @KajiDousa · Aug 9

People in places of spiritual authority who encourage a victim to keep turning cheeks for intimate partner violence weaponize Scripture and enforce weakness that is not grounded in God's love. 🙏 2/6

1 1

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Pastor Kaji Douša @KajiDousa · Aug 9

I don't know who this is for today but: "Love heals. Love does not strike.

"Turn the other cheek" weaponized is the opposite of strength: it requires weakness." 🙏 1/6

Lillian Daniel @lillianfdaniel

"The most effective prayers for abusers are offered from the strength garnered with distance. Pray with your cheek far from the strike and find your strength. Sometimes the best way to love your enemy is to name them as such." - @KajiDousa on Abusers ucc.org/daily_devotion...

1 2

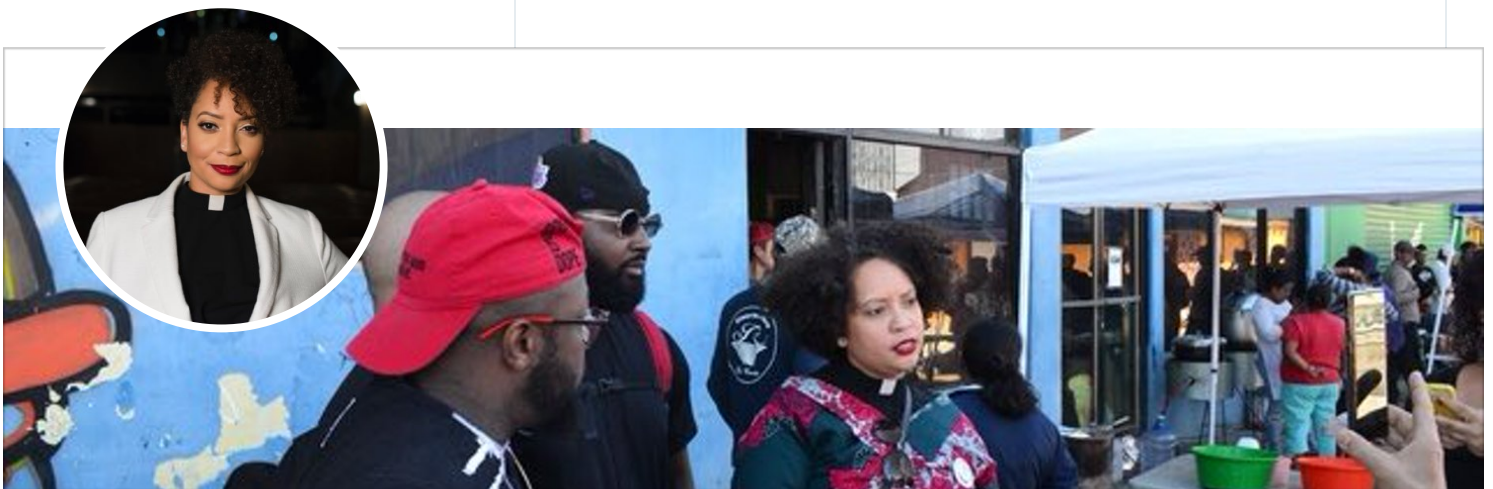
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↻ Pastor Kaji Douša Retweeted



Jen Parker @JenParker393 · Aug 7

Angela Davis and @FJasmineG grace our pages with this lovely essay on their friend Toni Morrison, which I had the honor of editing



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@KajiDousa

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Pastor Kaji Douša @KajiDousa · Aug 9

This blessed me on today, @imaniperry. Thank you. "She saw the writer black, and bid her sing."

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letters. She made the world pay rapt attention to the interior lives of Black women—ordinary, struggling Black women—to care about our imaginations and hearts,” writes @imaniperry thecut.io/2KvYFhS



1

Pastor Kaji Douša Retweeted

**Amanda Crump** @amandavcrump · Aug 8

10/10. This is a destruction of science by this administration. By @SecretarySonny. This ends my angry rant but not my anger. And not my sadness.



125



1.1K

3.9K

[Show this thread](#)**Pastor Kaji Douša** @KajiDouša · Aug 9

I expect that every effort will be made to cancel citizenship

Black Identity Extremist @WilGafney

In 10 years our crime rates and societal dysfunction will track back to these acts.(If we don't find a way to strip their citizenship.)

[Show this thread](#)

2

Pastor Kaji Douša Retweeted

**Black Identity Extremist** @WilGafney · Aug 8

So many of the children we are traumatizing are our citizens, meaning they will live out their trauma, rage, hurt, emotional damage and subsequent harmful acts - including self-harm - in our midst. We will not care for them. We will institutionalize and incarcerate them.



4



56

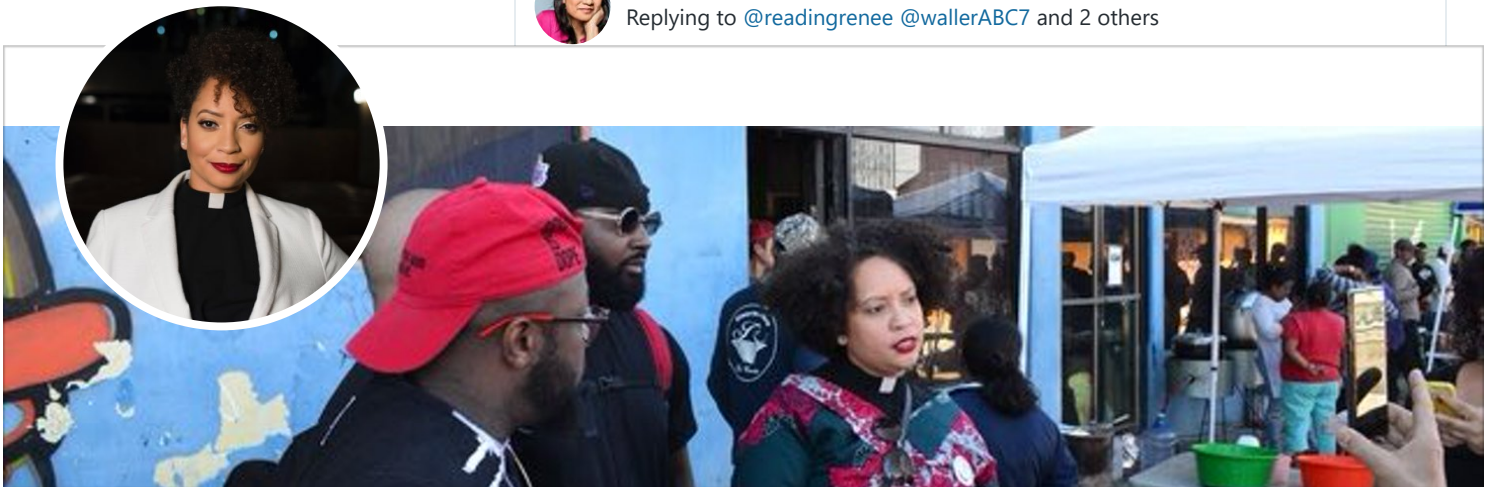
190

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Pastor Kaji Douša Retweeted

**Lynn Johnston** @lynnjohnstonlit · Aug 7

Replying to @readingrenee @wallerABC7 and 2 others

**Pastor Kaji Douša**

@KajiDouša

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**Wendy Cervantes** @WendyCervantes · Aug 8

Worksite raids often result in the loss of income for affected families, making it more difficult to make ends meet. Schools, child care centers, & other providers will be left to help families pick up the pieces after these man-made disasters.

[#ICEraids](#) (9/10)

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Pastor Kaji Douša Retweeted

**Claire McCaskill** @clairecmc · Aug 8

When 600 agents were making a show of arresting 680 undocumented immigrants working at Mississippi processing plants, did anyone bother to arrest the employers? Or did they leave them undisturbed in the back room counting their money?



4.2K



38K

136K

**Pastor Kaji Douša** @KajiDousa · Aug 8

I, for one, as a pastor included on this political hitlist, would love some real answers. Which is why we are suing for some accountability.

#NBC7 San Diego @nbcsandiego

NBC 7 Investigates: The Department of Homeland Security has launched a widespread investigation into the secret government surveillance of journalists and activists at the U.S.-Mexico border. on.nbc7.com/LKCik0p



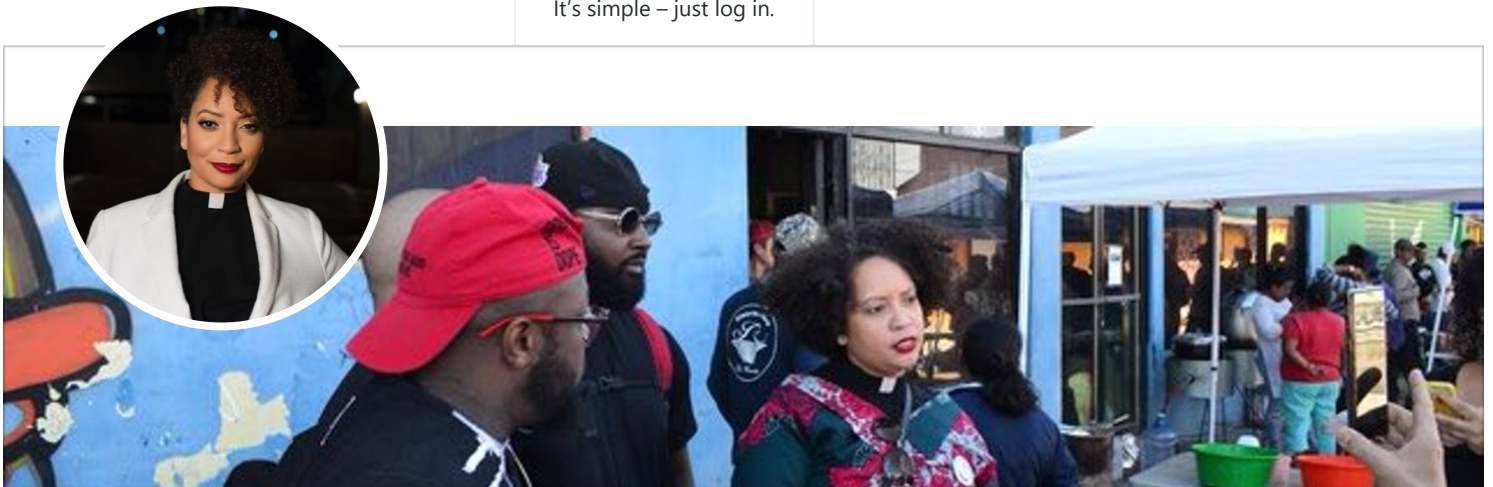
5

18



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@KajiDousa

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Peter Heltzel
@PeterHeltzel

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[Steve King](#)

17.4K Tweets

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30.8K Tweets

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